

UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION

In re:) Chapter 9
)
CITY OF DETROIT, MICHIGAN,) Case No. 13-53846
)
) Hon. Steven W. Rhodes
Debtor.)
)

**DETROIT RETIREMENT SYSTEMS'
DESIGNATION OF RECORD ON APPEAL**

Pursuant to Fed. R. Bankr. P. 8006 and this Court's Notice of December 9, 2013 [Dkt. # 1972], the Police and Fire Retirement System of the City of Detroit and the General Retirement System of the City of Detroit (together, the "**Retirement Systems**") respectfully submit this designation of items to be included in the record on appeal in connection with the Retirement Systems' Amended Notice of Appeal [Dkt. # 2096] from the Court's Opinion Regarding Eligibility [Dkt. # 1945] and Order for Relief Under Chapter 9 of the Bankruptcy Code [Dkt. # 1946].

DESIGNATION OF RECORD ON APPEAL

United States Bankruptcy Court for the
Eastern District of Michigan
Southern Division
Case No. 13-53846-SWR

| Item No. | Docket No. | Description of Entry | Date |
|----------|------------|--|---------|
| 1. | 1 | City's Chapter 9 Voluntary Petition | 7-18-13 |
| 2. | 10 | City's Statement of Qualifications Pursuant to Section 109(c) of the Bankruptcy Code | 7-18-13 |
| 3. | 11 | Declaration of Kevyn D. Orr in Support of City's Statement of Qualifications (Attachments #1 Ex. A – June 14, 2013 City Proposal for Creditors; #2 Ex. B – June 14, 2013 City Proposal for Creditors, Executive Summary; #3 Ex. C – City's Notice of Preliminary Financial Review Findings and Appointment of a Financial Review Team; #4 Ex. D – Mar. 26, 2013 Report of Detroit Financial Review Team; #5 Ex. E – Financial Stability Agreement; #6 Ex. F – Dec. 14, 2012 Preliminary Review of the City of Detroit; #7 Ex. G – Feb. 19, 2013 Report of the Detroit Financial Review Team; #8 Ex. H – Mar. 1, 2013 Letter from Governor Snyder to Mayor Bing and Detroit City Council Members; #9 Ex. I – July 8, 2013 Ambac Comments on Detroit; #10 Ex. J – July 16, 2013 Emergency Manager's Recommendation to File Bankruptcy; #11 Ex. K – July 18, 2013 Governor's Authorization to File Bankruptcy; #12 Ex. L – Emergency Manager's Order No. 13 to File Bankruptcy) | 7-18-13 |
| 4. | 12 | Declaration of Gaurav Malhotra in Support of City's Statement of Qualifications | 7-18-13 |

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| 5. | 13 | Declaration of Charles M. Moore in Support of City's Statement of Qualifications | 7-18-13 |
| 6. | 14 | City's Memorandum in Support of Statement of Qualifications | 7-18-13 |
| 7. | 56 | Motion of Debtor, Pursuant to Section 105(a) of the Bankruptcy Code, for Entry of an Order Extending the Chapter 9 Stay to Certain (A) State Entities, (B) Non-Officer Employees and (C) Agents and Representatives of the Debtor | 7-19-13 |
| 8. | 280 | First Order Establishing Dates and Deadlines | 8-2-13 |
| 9. | 384 | Objections to the Petition Filed by One Kevyn D. Orr Seeking to Commence a Case Under Chapter 9 of Title 11 of the United States Code | 8-19-13 |
| 10. | 453 | AFSCME's Notice of Constitutional Challenge to Statute | 8-19-13 |
| 11. | 481 | Attorney General Bill Schuette's Statement Regarding the Michigan Constitution and the Bankruptcy of the City of Detroit | 8-19-13 |
| 12. | 484 | Joinder of Local 324, International Union of Operating Engineers as Interesteded (<i>sic</i>) Party to Objections to Detroit's Eligibility | 8-19-13 |
| 13. | 486 | Joinder of Local 517M, Service Employees International Union as Interesteded (<i>sic</i>) Party to Objections to Detroit's Eligibility | 8-19-13 |
| 14. | 495 | Individual David Sole's Objection to Eligibility (Attachments #1 Index of Exhibits; #2 Ex. 1 – <i>Gracie Webster, et al. v. State of Michigan</i> , Ingham County Circuit Court Case No. 13-734-CZ, Order of Declaratory Judgment; #3 Ex. 2 – List of states authorizing Chapter 9 filing) | 8-19-13 |

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| 15. | 502 | Retiree Associations' Consolidated Objection to Eligibility (Attachments #1 Exhibit List; #2 Ex. A – Declaration of Shirley V. Lightsey; #3 Ex. B – Declaration of Donald Taylor) | 8-19-13 |
| 16. | 504 | Individuals' Objection to Eligibility | 8-19-13 |
| 17. | 505 | AFSCME's Objection to Eligibility (Attachments #1 Ex. 1 – 1/31/13 Email from Dan Moss to Kevyn Orr, JD-RD-0000300; #2 Ex. 2 – 1/31/13 Email from Dan Moss to Kevyn Orr, JD-RD-0000300-301; #3 Ex. 3 – 1/31/13 Email from Kevyn Orr to Corinne Ball, JD-RD-0000295; #4 Ex. 4 – 1/31/13 Email from Kevyn Orr to Stephen J. Brogan and Corinne Ball, JD-RD-0000303; #5 Ex. 5 – 6/17/13 Correspondence from Steven Kreisberg to Kyle Herman; #6 Ex. 6 – 6/14/13 Correspondence from Brian West Easley to Ed McNeil; #7 Ex. 7 – 6/27/13 Correspondence from Brian West Easley to James Williams; #8 Ex. 8 – 7/2/13 Correspondence from Steven Kreisberg to Brian West Easterley (<i>sic</i>); #9 Ex. 9 – 7/3/13 Correspondence from Brian West Easley to Steven Kreisberg; #10 Ex. 10 – 6/28/13 Email from Edward McNeil to Steve Kreisberg; #11 Ex. 11 – 8/6/13 Correspondence from Steven Kreisberg to Evan Miller; #12 Ex. 12 – 8/8/13 Correspondence from Evan Miller to Steven Kreisberg; #13 Ex. A – <i>Gracie Webster, et al., v. State of Michigan</i> , Ingham County Circuit Court Case No. 13-000734-CZ, Temporary Restraining Order; #14 Ex. B – <i>Gracie Webster, et al., v. State of Michigan</i> , Ingham County Circuit Court Case No. 13-734-CZ, Order of Declaratory Judgment; #15 Ex. C – June 14, 2013 Proposal for Creditors) | 8-19-13 |
| 18. | 506 | UAW's Objection to Eligibility | 8-19-13 |

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| 19. | 509 | Declaration of Steven Kreisberg (Attachments #1 Ex. 1 – 1-31-13 Email from Daniel T. Moss to Kevyn Orr, JD-RD-0000300; #2 Ex. 2 – 1-31-13 Email from Daniel T. Moss to Kevyn Orr, JD-RD-0000300-301; #3 Ex. 3 – 1/31/13 Email from Kevyn Orr to Corinne Ball, JD-RD-0000295; #4 Ex. 4 – 1/31/13 Email from Kevyn Orr to Stephen J. Brogan and Corinne Ball, JD-RD-0000303; #5 Ex. 5 – 6/17/13 Correspondence from Steven Kreisberg to Kyle Herman; #6 Ex. 6 – 6/14/13 Correspondence from Brian West Easley to Ed McNeil; #7 Ex. 7 – 6/27/13 Correspondence from Brian West Easley to James Williams; #8 Ex. 8 – 7/2/13 Correspondence from Steven Kreisberg to Brian West Easterley (<i>sic</i>); #9 Ex. 9 – 7/3/13 Correspondence from Brian West Easley to Steven Kreisberg; #10 Ex. 10 – 6/28/13 Email from Edward McNeil to Steve Kreisberg; #11 Ex. 11 – 8/6/13 Correspondence from Steven Kreisberg to Evan Miller; #12 Ex. 12 – 8/8/13 Correspondence from Evan Miller to Steven Kreisberg; #13 Ex. A – <i>Gracie Webster, et al., v. State of Michigan</i> , Ingham County Circuit Court Case No. 13-000734-CZ, Temporary Restraining Order; #14 Ex. B – <i>Gracie Webster, et al., v. State of Michigan</i> , Ingham County Circuit Court Case No. 13-734-CZ, Order of Declaratory Judgment; #15 Ex. C – June 14, 2013 Proposal for Creditors) | 8-19-13 |
| 20. | 512 | Detroit Police and Fire Associations' Objection to Eligibility (Attachments #1 Ex. A – Declaration of Mark Diaz in Support of Objection; #2 Ex. A-1 (Part 1) – In the Matter of: City of Detroit and Detroit Police Officers Association, MERC Case No. D12 D-0354, Panel's Findings, Opinions and Orders; #3 Ex. A-1 (Part 2); #4 Ex. A-1 (Part 3); #5 Ex. A-2 – In the Matter of: City of Detroit and Detroit Police Officers Association, MERC Case No. D12 D-0354, | 8-19-13 |

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| | | Chairman's Partial Award on Health Insurance; #6 Ex. B – Declaration of Daniel F. McNamara in Support of Objection; #7 Ex. C – Declaration of Mark Young, President of the Detroit Police Lieutenants and Sergeants Association in Support of Objection; #8 Ex. D – Declaration of Mary Ellen Gurewitz in Support of Objection) | |
| 21. | 514 | Center for Community Justice and Advocacy's Objection to Eligibility (Attachments #1 Index of Exhibits; #2 Ex. 1 - <i>Gracie Webster, et al. v. State of Michigan</i> , Ingham County Circuit Court Case No. 13-734-CZ, Order of Declaratory Judgment; #3 Ex. 2 – States Authorizing Chapter 9 Bankruptcy Filing) | 8-19-13 |
| 22. | 519 | Detroit Retirement Systems' Objection to Eligibility (Attachments #1 Exhibit List; #2 Ex. 1 – <i>Webster, et al. v. The State of Michigan, et al.</i> , Circuit Court for the County of Ingham, Case No. 13-734-CZ, Defendant's Motion for Summary Disposition; #3 Ex. 2 – <i>Webster, et al. v. The State of Michigan, et al.</i> , Circuit Court for the County of Ingham, Case No. 13-734-CZ, Order of Declaratory Judgment; #4 Ex. 3 – July 24, 2013 Transcript of Hearing Before the Bankruptcy Court Judge; #5 Ex. 4 – <i>Webster, et al. v. The State of Michigan, et al.</i> , Circuit Court for the County of Ingham, Case No. 13-734-CZ, Verified Complaint for Declaratory Judgment and Injunctive Relief; #6 Ex. 5 - <i>Webster, et al. v. The State of Michigan, et al.</i> , Circuit Court for the County of Ingham, Case No. 13-734-CZ, July 19, 2013 Transcript of Hearing on Motion to Amend Preliminary Injunction, Motion for Default Judgment, and Motion for Summary Disposition; #7 Ex. 6 - <i>Webster, et al. v. The State of Michigan, et al.</i> , Circuit Court for the County of Ingham, Case No. 13-734-CZ, Register of Actions; #8 Ex. 7-1 – | 8-19-13 |

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| | | Unpublished Cases; #9 Ex. 7-2 – Unpublished Cases) | |
| 23. | 520 | Retired Detroit Police Members Association's Objection to Eligibility | 8-19-13 |
| 24. | 642 | Order Regarding Eligibility Objections Notices of Hearings And Certifications Pursuant to 28 U.S.C. § 2403(a) & (b) | 8-26-13 |
| 25. | 756 | State of Michigan's Response to Eligibility Objections Raising Only Legal Issues | 9-6-13 |
| 26. | 765 | City's Consolidated Reply to Objections to the Entry of an Order for Relief | 9-6-13 |
| 27. | 805 | Official Committee of Retirees' Objection to Eligibility | 9-10-13 |
| 28. | 806 | The Official Committee of Retirees' Motion to Withdraw the Reference | 9-11-13 |
| 29. | 821 | FIRST AMENDED Order Regarding Eligibility Objections Notices of Hearings And Certifications Pursuant to 28 U.S.C. § 2403(a) & (b) | 9-12-13 |
| 30. | 844 | Detroit Retirement Systems' Responses and Objections to the Debtor's First Set of Requests for Production of Documents | 9-13-13 |
| 31. | 849 | City's Objections and Responses to Detroit Retirement Systems' First Requests for Admission | 9-13-13 |
| 32. | 852 | City's Objections and Responses to Detroit Retirement Systems' First Requests for Production of Documents | 9-13-13 |
| 33. | 918 | City's Reply to the Objection of the Official Committee of Retirees | 9-17-13 |

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| 34. | 940 | Opposition to Michigan Council 25 of the AFSCME, AFL-CIO, and Sub-Chapter 98, City of Detroit Retirees' Motion to Compel Testimony of Kevyn Orr and All Other City and State Witnesses Regarding City-State Communications Prior to July 17, 2003; Exhibit A, Letter from Governor Rick Snyder to Kevyn D. Orr enclosing Contract for Emergency Manager Services; Exhibit B Common Interest Agreement | 9-19-13 |
| 35. | 1059 | Notice of Filing of Second Amended List of Creditors and Claims, Pursuant to Sections 924 and 925 of the Bankruptcy Code (Attachments #1 Summary of Schedules; #2 Creditor List Part 1 – Schedules A – M; #3 Creditor List Part 2 – Schedules N – O) | 9-30-13 |
| 36. | 1085 | State of Michigan's Supplemental Response to Eligibility Objections Raising Only Legal Issues | 10-4-13 |
| 37. | 1149 | United States of America's Memorandum in Support of Constitutionality of Chapter 9 of Title 11 of the United States Code | 10-11-13 |
| 38. | 1156 | AFSCME's Amended Objection to Eligibility | 10-11-13 |
| 39. | 1159 | Declaration of Michael Artz | 10-11-13 |
| 40. | 1162 | Declaration of Steven Kreisberg | 10-11-13 |
| 41. | 1163 | Notice of Filing Marked Version of <u>Amended</u> Objection to the City of Detroit's Eligibility to Obtain Relief Under Chapter 9 of the Bankruptcy Code | 10-11-13 |

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| 42. | 1166 | Reply in Support of Objection of the Detroit Retirement Systems to the Eligibility of the City of Detroit, Michigan to be a Debtor Under Chapter 9 of the Bankruptcy Code (Attachments #1 Exhibit List; #2 Ex. A – Excerpt from Transcript of Kevyn Orr’s 9/16/13 Deposition; #3 Ex. B – Excerpt from Transcript of Governor Richard D. Snyder’s 10/9/13 Deposition; #4 Ex. C – Unpublished Cases Cited in Reply) | 10-11-13 |
| 43. | 1169 | Amended Objection of the Detroit Fire Fighters Association, the Detroit Police Officers Association, the Detroit Police Lieutenants & Sergeants Association and the Detroit Police Command Officers Association to the Debtor’s Bankruptcy Petition and Statement of Qualifications Under 11 U.S.C. Section 109(c) | 10-11-13 |
| 44. | 1170 | Amended Joint Objection of International Union, UAW and the <i>Flowers</i> Plaintiffs to the City of Detroit, Michigan’s Eligibility for an Order for Relief Under Chapter 9 of the Bankruptcy Code | 10-11-13 |
| 45. | 1174 | Supplemental Objection of the Official Committee of Retirees to Eligibility of the City of Detroit, Michigan to Be a Debtor Under Chapter 9 of the Bankruptcy Code | 10-11-13 |
| 46. | 1175 | Declaration of Claude D. Montgomery, Esq. in Support of the Comm. Supp. Obj. (Attachments #1 Ex. A – Deposition Transcript of Kevyn Orr; #2 Ex. A (Part 1) – Deposition Transcript of Kevyn Orr; #3 Ex. A (Part 2) – Deposition Transcript of Kevyn Orr; #4 Ex. A (Part 3) – Deposition Transcript of Kevyn Orr; #5 Ex. A (Part 4) – Deposition Transcript of Kevyn Orr; #6 Ex. A (Part 5) – Deposition Transcript of Kevyn Orr; #7 Ex. B – Deposition Transcript of Kevyn Orr) | 10-12-13 |

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| | | Transcript of Charles Moore; #8 Ex. C – Deposition Transcript of Lamont Satchel; #9 Ex. D – Deposition Transcript of Andy Dillon; #10 Ex. E – Deposition Transcript of Glenn Bowen) | |
| 47. | 1207 | Retirement Systems' Transcript Order Form for October 15, 2013 Hearing | 10-16-13 |
| 48. | 1208 | Retirement Systems' Transcript Order Form for October 16, 2013 Hearing | 10-16-13 |
| 49. | 1219 | State of Michigan's Supplement to the Record Regarding Eligibility (Attachments #1 <i>Webster, et al. v. The State of Michigan, et al.</i> , Circuit Court for the County of Ingham, Case No. 13-734-CZ ("Webster"), Register of Actions; #2 <i>Webster</i> , Summons and Complaint; #3 <i>Webster</i> , Dillon Acknowledgment; #4 <i>Webster</i> , Defendants' Response to Plaintiffs' Motion for Declaratory Judgment or Preliminary Injunction and Brief in Support of Defendants' Motion for Summary Disposition; #5 <i>Webster</i> , Plaintiffs' Reply Brief in Support of Motion for Declaratory Judgment and Expedited Hearing; #6 <i>Webster</i> , Temporary Restraining Order; #7 <i>Webster</i> , Notice of Suggestion of Pendency of Bankruptcy Case and Application of the Automatic Stay; #8 Proof of Service; #9 <i>The General Retirement System of the City of Detroit, et al. v. Kevyn D. Orr, et al.</i> , Circuit Court for the County of Ingham, Case No. 13-768-CZ, <i>Webster, et al. v. The State of Michigan, et al.</i> , Circuit Court for the County of Ingham, Case No. 13-734-CZ, <i>Flowers, et al., v. Snyder, et al.</i> , Circuit Court for the County of Ingham, Case No. 13-729-CZ (collectively, "Webster-Flowers"), Transcript from July 18, 2013 Hearing on Motion for Preliminary Injunction; #10 <i>Webster-Flowers</i> , Transcript from | 10-17-13 |

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| | | July 19, 2013 Hearing on Motion to Amend Preliminary Injunction, Motion for Default Judgment, and Motion for Summary Disposition; #11 <i>Webster</i> , Order; #12 <i>Webster</i> , Order of Declaratory Judgment; #13 <i>Webster</i> , Order) | |
| 50. | 1220 | <i>Gracie Webster v. State of Michigan</i> , Appellate Docket Sheet, Michigan Court of Appeals Case No. 317292 (Attachments #1 Claim of Appeal; #2 Letter to Clerk Hauser; #3 Letter Regarding Bankruptcy Stay; #4 Order) | 10-17-13 |
| 51. | 1221 | <i>Webster</i> No. 317292, Appellate Docket Sheet (Attachments #1 Jurisdictional Checklist; #2 Defendants' Motions for Stay Pending Appeal, Stay of Proceedings, and for Immediate Consideration; #3 Voluntary Petition; #4 Letter to Clerk Hauser; #5 Emergency Application for Leave to Appeal, Part 1; #6 Emergency Application for Leave to Appeal, Part 2; #7 Michigan Court of Appeals copy of Transcript from July 18, 2013 Hearing in Ingham County Circuit Court before the Hon. Rosemarie Aquilina; #8 <i>Webster, et al. v. The State of Michigan, et al.</i> , Circuit Court for the County of Ingham, Case No. 13-734-CZ, <i>Flowers, et al., v. Snyder, et al.</i> , Circuit Court for the County of Ingham, Case No. 13-729-CZ, Transcript from July 19, 2013 Hearing on Motion to Amend Preliminary Injunction, Motion for Default Judgment, and Motion for Summary Disposition; #9 <i>Gracie Webster v. State of Michigan</i> , Michigan Court of Appeals Docket No. 317286 ("Webster No. 317286"), Order; #10 <i>Webster</i> No. 317286, Plaintiffs-Appellees Statement Regarding Appeal; #11 Letter to Clerk Hauser; #12 <i>Webster</i> No. 317286, Order) | 10-17-13 |

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| 52. | 1222 | Interested Party Krystal A. Crittendon's Objections to the Petition Filed by One Kevyn D. Orr Seeking to Commence a Case Under Chapter 9 of Title 11 of the United States Code on Behalf of the City of Detroit, Michigan | 10-17-13 |
| 53. | 1227 | AFSCME's Pretrial Brief Regarding the City of Detroit's Eligibility to Obtain Relief Under Chapter 9 of the Bankruptcy Code | 10-17-13 |
| 54. | 1228 | Supplemental Declaration of Michael Artz | 10-17-13 |
| 55. | 1229 | Consolidated Trial Brief of the Retiree Association Parties in Opposition to Eligibility | 10-17-13 |
| 56. | 1230 | Pre-Trial Brief of the Detroit Public Safety Unions, Consisting of the Detroit Fire Fighters Association, the Detroit Police Officers Association, the Detroit Police Lieutenants & Sargeants (<i>sic</i>) Association and the Detroit Police Command Officers Association | 10-17-13 |
| 57. | 1231 | Retired Detroit Police Members Association's Pretrial Brief, Proposed Findings of Fact and Proposed Conclusions of Law (Attachments #1 Ex. A – Excerpt from Transcript of Howard Ryan 10/14/13 Deposition; #2 Ex. B – Comparison of PA 4 and PA 436; #3 Ex. C – Excerpt from Transcript of Treasurer Andrew Dillon 10/10/13 Deposition) | 10-17-13 |
| 58. | 1235 | Pre-Trial Brief of International Union, UAW and the <i>Flowers</i> Plaintiffs with Respect to the Eligibility of the City of Detroit, Michigan for an Order for Relief Under Chapter 9 of the Bankruptcy Code | 10-17-13 |
| 59. | 1240 | City of Detroit's Pre-Trial Brief in (I) Support of Entry of an Order for Relief and (II) Opposition to Objections Requiring the Resolution of Issues of Material Fact (Attachments #1 Ex. A – <i>Robert</i> | 10-17-13 |

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| | | <p><i>Davis v. Roy Roberts</i>, Michigan Court of Appeals Docket No. 313297, Order; #2 Ex. B – Contract for Emergency Financial Manager Services; #3 Ex. C – Excerpt from Transcript of September 20, 2013 Deposition of Kenneth A. Buckfire; #4 Ex. D t – Excerpt from Transcript of September 20, 2013 Deposition of Gaurav Malhotra; #5 Ex. E – Excerpt from Transcript of September 24, 2013 Deposition of Glenn David Bowen; #6 Ex. F – Excerpt from Trust Indenture Among the City of Detroit, Detroit Water and Sewerage Department and U.S. Bank National Association Relating to the Outstanding Secured Obligations of the Detroit Water and Sewerage Department (Sewage Disposal System) Dated as of June 1, 2012; #7 Ex. G – Excerpt from Transcript of September 19, 2013 Deposition of Lamont Satchel; #8 Ex. H – Excerpt from Transcript of September 16, 2013 Deposition of Kevyn Orr; #9 Ex. I – Excerpt from Transcript of October 9, 2013 Deposition of Governor Richard D. Snyder)</p> | |
| 60. | 1241 | Pre-Trial Brief of the Official Committee of Retirees Regarding the City of Detroit's Eligibility to Be a Debtor Under Chapter 9 of the Bankruptcy Code | 10-17-13 |
| 61. | 1242 | <p>Declaration of Claude D. Montgomery, Esq. in Support of Ret. Comm. Pre-Trial Br. (Attachments #1 Ex. A – Transcript of September 16, 2013 Deposition of Kevyn Orr; #2 Ex. B – Excerpt from Transcript of September 20, 2013 Deposition of Gaurav Malhotra; #3 Ex. C – Excerpt from Transcript of October 9, 2013 Deposition of Governor Richard D. Snyder; #4 Ex. D – Excerpt from Transcript of September 19, 2013 Deposition of Lamont Satchel; #5 Ex. E – Excerpt from Transcript of October 14, 2013 Deposition of Mayor Dave Bing; #6 Ex. F – Excerpt from Transcript of</p> | 10-17-13 |

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| | | September 18, 2013 Deposition of Charles M. Moore; #7 Ex. G – Excerpt from Transcript of September 24, 2013 Deposition of Glenn David Bowen; #8 Ex. H – Excerpt from Transcript of October 10, 2013 Deposition of Treasurer Andrew Dillon) | |
| 62. | 1244 | Pre-Hearing Brief of the Detroit Retirement Systems in Support of Their Eligibility Objections Specifically Pursuant to Sections 109(c)(5) and 921(c) of the Bankruptcy Code | 10-17-13 |
| 63. | 1245 | List of Exhibits to Det. Ret. Sys. Pre-Hrng. Br. (Attachments #1 Ex. A - Excerpt from Transcript of October 9, 2013 Deposition of Governor Richard D. Snyder; #2 Ex. B - Excerpt from Transcript of September 16, 2013 Deposition of Kevyn Orr; #3 Ex. C, Part 1 – Jones Day Presentation to The City of Detroit, January 29, 2013; #4 Ex. C, Part 2 – Jones Day Presentation to The City of Detroit, January 29, 2013; #5 Br. Ex. D t – Excerpt from Transcript of September 18, 2013 Deposition of Charles M. Moore) | 10-18-13 |
| 64. | 1268 | Transcript of October 15, 2013 Hearing RE. Objections to Eligibility to Chapter 9 Petition Before the Honorable Steven W. Rhodes United States Bankruptcy Court Judge | 10-20-13 |
| 65. | 1271 | Transcript of October 16, 2013 Hearing RE. Objections to Eligibility to Chapter 9 Petition Before the Honorable Steven W. Rhodes United States Bankruptcy Court Judge | 10-20-13 |
| 66. | 1356 | Pre-Trial Order | 10-24-13 |

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| 67. | 1411 | Transcript of October 23, 2013 Hearing RE. Eligibility Trial Before the Honorable Steven W. Rhodes United States Bankruptcy Court Judge | 10-27-13 |
| 68. | 1447 | Retirement Systems' Transcript Order Form for October 23, 2103 Hearing | 10-29-13 |
| 69. | 1448 | Retirement Systems' Transcript Order Form for October 24, 2013 Hearing | 10-29-13 |
| 70. | 1449 | Retirement Systems' Transcript Order Form for October 25, 2013 Hearing | 10-29-13 |
| 71. | 1458 | Supplemental Brief in Support of Objection by Interested Party David Sole to the City of Detroit's Eligibility to Obtain Relief Under Chapter 9 of the Bankruptcy Code [Docket 495] (Attachments #1 Index of Exhibits; #2 Ex. 1 - <i>General Motors Acceptance Corp. v. Citizens Commercial Bank</i> , 2001 Mich. App. LEXIS 295 (Mich. Ct. App. Dec. 18, 2001); #3 Ex. 2 - <i>Bolhuis v. Public School Employee's Retirement System</i> , 2011 Mich. App. LEXIS 1392 (Mich. Ct. App. July 26, 2011)) | 10-30-13 |
| 72. | 1462 | Supplemental Brief of the Retiree Association Parties on Eligibility | 10-30-13 |
| 73. | 1467 | AFSCME's Supplemental Brief Regarding Eligibility | 10-30-13 |
| 74. | 1469 | Supplemental Brief of International Union, UAW in Support of Their Amended Objection to the City of Detroit, Michigan's Eligibility for an Order for Relief Under Chapter 9 of the Bankruptcy Code | 10-30-13 |
| 75. | 1471 | Retired Detroit Police Members Association's Supplemental Brief in Support of Objectio (sic) to Eligibility | 10-30-13 |

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| 76. | 1472 | Supplemental Brief in Support of Objection of the Detroit Retirement Systems to the Eligibility of the City of Detroit, Michigan, to Be a Debtor Under Chapter 9 of the Bankruptcy Code | 10-30-13 |
| 77. | 1473 | Supplemental Brief of the Detroit Public Safety Unions on Eligibility Pursuant to Order Regarding Furtherh (<i>sic</i>) Briefing on Eligibility [Docket No. 1217] | 10-30-13 |
| 78. | 1474 | Supplemental Brief of the Official Committee of Retirees Regarding Ripeness | 10-30-13 |
| 79. | 1490 | Transcript of October 24, 2013 Hearing In RE: Eligibility Trial Before the Honorable Steven W. Rhodes United States Bankruptcy Court Judge | 11-1-13 |
| 80. | 1501 | Transcript of October 25, 2013 Hearing RE. Eligibility Trial (Continued) Before the Honorable Steven W. Rhodes United States Bankruptcy Court Judge | 11-2-13 |
| 81. | 1502 | Transcript of October 28, 2013 Hearing RE. Eligibility Trial (Continued) Before the Honorable Steven W. Rhodes United States Bankruptcy Court Judge | 11-3-13 |
| 82. | 1503 | Transcript Regarding October 29, 2013 Hearing In RE: Eligibility Trial Before the Honorable Steven W. Rhodes United States Bankruptcy Court Judge | 11-3-13 |

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| 83. | 1547 | The State's Response to Supplemental Briefing on Eligibility (Attachments #1 Exhibit Index; #2 Ex. 1 to – November 16, 2012 Order in <i>Davis V. Roberts</i> , Court of Appeals No. 313297; #3 Ex. 2 t – Local Emergency Financial Assistance Loan Board Order 2013-5, Appointment of Emergency Financial Manager) | 11-6-13 |
| 84. | 1550 | Retirement Systems' Transcript Order Form for October 28, 2013 Hearing | 11-6-13 |
| 85. | 1551 | Retirement Systems' Transcript Order Form for October 29, 2013 Hearing | 11-6-13 |
| 86. | 1552 | Retirement Systems' Transcript Order Form for November 4, 2013 Hearing | 11-6-13 |
| 87. | 1554 | Retirement Systems' Transcript Order Form for November 5, 2013 Hearing | 11-6-13 |
| 88. | 1556 | City of Detroit's Supplemental Brief in Support of Entry of an Order for Relief | 11-6-13 |
| 89. | 1560 | United States of America's Supplemental Brief in Support of the Constitutionality of Chapter 9 | 11-6-13 |
| 90. | 1584 | Transcript of November 5, 2013 Hearing In RE: Eligibility Trial Before the Honorable Steven W. Rhodes United States Bankruptcy Court Judge | 11-8-13 |
| 91. | 1601 | Retirement Systems' Transcript Order Form for November 7, 2013 Hearing | 11-8-13 |
| 92. | 1602 | Retirement Systems' Transcript Order Form for November 8, 2013 Hearing | 11-8-13 |

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| 93. | 1605 | Transcript of November 4, 2013 Hearing RE. Eligibility Trial (Continued) Before the Honorable Steven W. Rhodes United States Bankruptcy Court Judge | 11-8-13 |
| 94. | 1647 | Second Amended Final Pre-Trial Order | 11-10-13 |
| 95. | 1681 | Transcript of November 7, 2013 Hearing RE. Eligibility Trial (Continued) Before the Honorable Steven W. Rhodes United States Bankruptcy Court Judge | 11-12-13 |
| 96. | 1719 | Transcript Regarding November 8, 2013 Hearing In RE: Eligibility Trial Closing Arguments Before the Honorable Steven W. Rhodes United States Bankruptcy Court Judge | 11-14-13 |
| 97. | 1747 | Supplemental Order Regarding Second Amended Final Pre-Trial Order | 11-15-13 |
| 98. | 1800 | Supplemental Order on Exhibits | 11-25-13 |
| 99. | 1945 | Opinion Regarding Eligibility | 12-5-13 |
| 100. | 1946 | Order for Relief Under Chapter 9 of the Bankruptcy Code | 12-5-13 |
| 101. | 1947 | Transcript of December 3, 2013 Hearing RE. Bench Opinion RE. Eligibility Before the Honorable Steven W. Rhodes United States Bankruptcy Court Judge | 12-5-13 |
| 102. | 2268 | Certification Regarding Direct Appeal to the Court of Appeals | 12-20-13 |

| Item No. | Docket No. | Description of Entry | Date |
|-------------|---------------|--|----------|
| 103. | 2269 | Memorandum Regarding: I. Certification under 28 U.S.C. § 158(d)(2)(A)(i) II. Recommendation on Whether Direct Appeals Should be Authorized and III. Parties' Request to Recommend Expedited Consideration of Appeals | 12-20-13 |

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Respectfully submitted,

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